UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

ELG, a minor by Parent and Next Friend LATOREYA TILL,

Case No. 2:24-cv-12195 Hon. David M. Lawson

Plaintiff,

v.

JUDGE KENNETH KING, individually; UNIVERSAL PROTECTION SERVICES d/b/a ALLIED UNIVERSAL SECURITY SERVICES and/or ALLIED UNIVERSAL SECURITY SERVICES, LLC; JOHN DOE COURT OFFICER, individually; and JANE ROE COURT OFFICER individually,

Defendants.

FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.

JAMES J. HARRINGTON (P65351) GARY N. FELTY, JR. (P55554) Attorneys for Plaintiff 19390 West Ten Mile Road Southfield, Michigan 48075 (248) 355-5555/F: (248) 355-3148 j.harrington@fiegerlaw.com g.felty@fiegerlaw.com THE PERKINS LAW GROUP TODD RUSSELL PERKINS (P55623)

Attorney for Defendant 615 Griswold, Suite 400 Detroit, Michigan 48226 (313) 964-1702 tperkins@perkinslawgroup.net ______

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP VALERIE HENNING MOCK (P55572) MATTHEW J. HIGH (P82783) Attorneys for Defendant Universal Protection Service, LLC d/b/a Allied Universal Security Services 17197 N Laurel Park Drive, Ste 201 Livonia, MI 48152 (313) 327-3100 / (313 327-3101 (F)

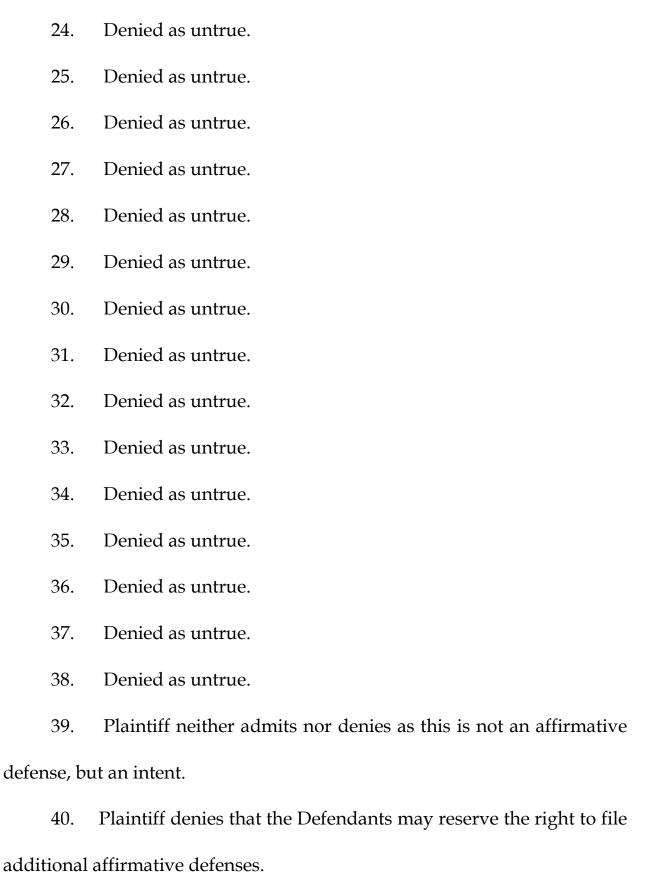
valerie.mock@wilsonelser.com

PLAINTIFF'S REPLY TO DEFENDANTS ALLIED UNIVERSAL SECURITY SERVICES LLC AND JANE ROE COURT OFFICER'S AFFIRMATIVE DEFENSES

NOW COMES Plaintiff, ELG, a minor by Parent and Next Friend LATOREYA TILL, by and through her attorneys, FIEGER, FIEGER, KENNEY & HARRINGTON, P.C., and in Answer to Defendants Allied Universal Security Services LLC and Jane Roe Court Officer's Affirmative Defenses hereby states as follows:

- 1. Denied as untrue.
- 2. Denied as untrue.
- 3. Denied as untrue.
- 4. Denied as untrue.

- Denied as untrue.
 Denied as untrue.
- 11. Denied as untrue.
- 12. Denied as untrue.
- 13. Denied as untrue.
- 14. Denied as untrue.
- 15. Denied as untrue.
- 16. Denied as untrue.
- 17. Denied as untrue.
- 18. Denied as untrue.
- 19. Denied as untrue.
- 20. Denied as untrue.
- 21. Denied as untrue.
- 22. Denied as untrue.
- 23. Denied as untrue.



Respectfully submitted,

/s/ Gary N. Felty, Jr.

JAMES J. HARRINGTON (P65351) GARY N. FELTY, JR. (P55554) FIEGER, FIEGER, KENNEY & HARRINGTON, P.C. Attorneys for Plaintiff 19390 West Ten Mile Road Southfield, Michigan 48075 (248) 355-5555 g.felty@fiegerlaw.com

Dated: 11/14/2024

CERTIFICATE OF SERVICE

I hereby certify that on 11/14/2024, I served this foregoing instrument to all counsel of record and with the Clerk of the Court using the ECF system.

I further hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: N/A

/s/Gary N. Felty, Jr.

JAMES J. HARRINGTON (P65351)

GARY N. FELTY, JR. (P55554)

FIEGER, FIEGER, KENNEY

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